IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

SOU	THERN DISTRICT OF MISSISSIPPI FILED
\prod	JUN 26 2014
BY_	ARTHUR JOHNSTON DEPUTY

	BY
VAUGHN PERRET)
CHARLES LEARY) PLAINTIFFS
TROUT POINT LODGE, LTD, A Nova)
Limited Company)
)
V.) Civil Action No.1:14cv241-LG-JMR
DOLIOI AG HANDGHOF)
DOUGLAS HANDSHOE) DEFENDANT
	}

DEFENSES AND ANSWER TO PETITION TO ENROLL FOREIGN JUDGMENT

NOW INTO COURT, comes Douglas Handshoe, who files this, his defenses and answer against Vaughn Perret, Charles Leary and Trout Point Lodge, Ltd., and in support thereof respectfully states as follows:

FIRST DEFENSE

The Canadian court did not have personal jurisdiction over the defendant.

SECOND DEFENSE

The legal doctrine of Res Judicata bars this action.

THIRD DEFENSE

The Canadian court lacked subject matter jurisdiction over United States based images and copyright law.

FOUTH DEFENSE

The SPEECH Act of 2010 bars enforcement of this foreign judgment.

FIFTH DEFENSE

The defendant will rely on all defenses at the time of trial. Defendant reserves the right to amend this Answer and supplement its affirmative Defenses as additional information becomes available.

ANSWER TO PETITION TO ENROLL FOREIGN JUDGMENT

- 1. Admitted
- 2. It is Admitted that the Canadian court bifurcated this action post judgment into multiple component judgments.
- 3. The allegations in this paragraph are denied.
- 4. The allegation in this paragraph is denied.
- 5. This paragraph contains no allegation.
- 6. This paragraph contains no allegation.

Defendant prays that this Court, pursuant to the SPEECH Act of 2010 declare all the judgments that constitute this instant action as repugnant to the Constitution of the United States and dismiss this action. Further, Defendant prays this court, pursuant to the SPEECH Act of 2010 award him all fees and costs associated with this action.

Respectfully submitted this 25th day of June, 2014,

Defendant

Douglas Handshoe

214 Corinth Drive

Bay St Louis, MS 39520

(601) 928-5380

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CERTIFICATE OF SERVICE

I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing Defenses and Answer to the following via United States Mail:

M. Judith Barnett, Esq. 1911 Dunbarton Drive Jackson, MS 39216 Telephone: (601) 981-4450

Facsimile: (601) 981-4717 mjbarnettpa@yahoo.com Attorney for Plaintiffs

Respectfully submitted this 25th day of June, 2014,

Defendant

Douglas Handshoe

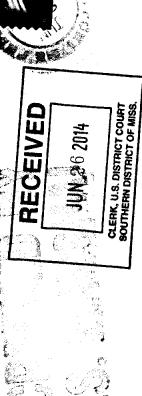
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CLERK OF THE US DISTRICT COURT DAN M. RUSSELL, JR. UNITED STATES COURTHOUSE 2012 15TH STREET, SUITE 403 GULFPORT, MS 39501